

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STEVEN SCHMALZ, On Behalf of Himself	:	Civil Action No. 7:08-cv-00264-KMK
and All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
vs.	:	
MBIA, INC., et al.,	:	
	:	
Defendants.	:	
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TEAMSTERS LOCAL 807 LABOR	:	Civil Action No. 7:08-cv-01845-UA
MANAGEMENT PENSION FUND,	:	
Individually and on Behalf of All Others	:	<u>CLASS ACTION</u>
Similarly Situated,	:	
	:	
Plaintiff,	:	
vs.	:	
MBIA INC., et al.,	:	
	:	
Defendants.	:	
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GARY KOSSEFF, Individually and On Behalf	:	Civil Action No. 7:08-cv-02362-UA
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
vs.	:	
MBIA, INC., et al.,	:	
	:	
Defendants.	:	
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MASSACHUSETTS LABORERS' ANNUITY FUND'S MOTION FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S
SELECTION OF LEAD COUNSEL

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that putative class member Massachusetts Laborers' Annuity Fund will and hereby does move this Court, on a date and at such time as may be designated by the Court, at 300 Quarropas St., Room 533, White Plains, NY, 10601 for an order: (1) consolidating the related actions; (2) appointing the Massachusetts Laborers' Annuity Fund as lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §78u-4; and (3) approving the Massachusetts Laborers' Annuity Fund's selection of Coughlin Stoia Geller Rudman & Robbins LLP as lead counsel. In support of this motion, the Massachusetts Laborers' Annuity Fund submits the accompanying Memorandum of Law, the Affidavit of David A. Rosenfeld and a [Proposed] Order.

DATED: March 11, 2008

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA, JR.

s/ David A. Rosenfeld

DAVID A. ROSENFELD

58 S Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

[Proposed] Lead Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 11, 2008.

s/ David A. Rosenfeld

DAVID A. ROSENFELD

COUGHLIN STOIA GELLER

RUDMAN & ROBBINS LLP

58 South Service Road, Suite 200

Melville, NY 11747

Telephone: 631/367-7100

631/367-1173 (fax)

E-mail:drosenfeld@csgrr.com

Mailing Information for a Case 7:08-cv-00264-KMK

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Todd Seth Garber**
tgarber@lowey.com
- **Salvatore Jo Graziano**
SGraziano@blbglaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)